

Exhibit 7

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AND AFFILIATED PARTNERSHIPS

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July 2, 2015

The Honorable Jesse M. Furman
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *In re: General Motors LLC Ignition Switch Litigation,*
14-MD-2543 (JMF)

Dear Judge Furman:

Pursuant to this Court's Order No. 8 § V, Lead and Liaison Counsel and counsel for General Motors LLC ("New GM") submit this joint written update to advise the Court of matters of possible significance in proceedings related to MDL 2543.

First, on June 24, 2015, the Honorable Robert Altice, Jr. entered the MDL 2543 Coordination Order in *Dobbs v. General Motors LLC*, No. 49D051504PL010527 (Marion County, Ind.), a personal injury action alleging ignition switch defects in a 2006 Chevrolet Cobalt. A copy of the order is attached hereto as Exhibit 1.

Second, on June 26, 2015, the Honorable Sam Glasscock granted New GM's motion to dismiss in *In re: General Motors Derivative Litigation*, No. 9627-VCG (Del. Court of Chancery), a Related Ignition Switch Derivative Action. A copy of the opinion and order is attached hereto as Exhibit 2.

Third, on June 30, 2015, the Honorable David Dowd denied plaintiffs' motion for sanctions against New GM in *Felix, et al. v. General Motors LLC*, No. 1422-CC09472 (City of St. Louis, Mo.), which was the subject of the parties' May 22, 2015 joint letter to the Court. (*See* Doc. No. 978.) Although Judge Dowd denied plaintiffs' motion for sanctions, Judge Dowd did order New GM to reproduce all responsive documents and privilege logs that previously had been produced in the MDL Document Depository to the *Felix* plaintiffs on an encrypted hard drive within 30 days, with production of documents produced to Congress and NHTSA deferred by agreement of the parties. New GM's production is due on July 30, 2015. Separately, Judge Dowd granted plaintiffs' motion for leave to file an amended complaint. Copies of the orders denying plaintiffs' motion for sanctions and granting plaintiffs' motion for leave to amend are attached hereto as Exhibits 3–4, respectively. The *Felix* plaintiffs continue to receive access to

KIRKLAND & ELLIS LLP

The Honorable Jesse M. Furman
July 2, 2015
Page 2

the MDL Document Depository and opportunities to participate in MDL depositions. New GM will update the Court promptly of any developments in *Felix*, including whether this Court's assistance will be necessary.

Fourth, on June 30, 2015, New GM filed a supplemental reply brief in support of its motion for entry of the MDL 2543 Coordination Order in *Mathes v. General Motors LLC*, No. CL12001623-00 (Augusta County, Va.), which was the subject of the parties' May 22, 2015 joint letter to the Court. (See Doc. No. 978.) A copy of New GM's reply brief is attached hereto as Exhibit 5.

Fifth, New GM has filed or will file today opposed motions for entry of the MDL 2543 Coordination Order in seven Related Actions: *Berger, et al. v. General Motors LLC*, No. 9241/2014 (Kings County, N.Y.), a personal injury action alleging ignition switch defects in a 2005 Cadillac DeVille; *Bernard, et al. v. Schnittker, et al.*, No. 13-CI-00098 (Estill County, Ky.), a wrongful death action alleging ignition switch defects in a 2007 Chevrolet Cobalt; *Colarossi v. General Motors LLC, et al.*, No. 14-22445 (Suffolk County, N.Y.), a wrongful death action alleging ignition switch defects in a 2007 Chevrolet Cobalt; *Lucas v. General Motors LLC, et al.*, No. 15-CI-00033 (Perry County, Ky.), a personal injury action alleging ignition switch defects in a 2009 Chevrolet Cobalt; *Petrocelli v. General Motors LLC, et al.*, No. 14-17405 (Suffolk County, N.Y.), a wrongful death action alleging ignition switch defects in a 2006 Chevrolet Cobalt; *Popwell v. General Motors Company, Inc., et al.*, No. 03-CV-2014-901703.00 (Montgomery County, Ala.), an individual economic loss action alleging ignition switch defects in a 2010 Chevrolet Cobalt; and *Quiles v. Catsoulis, et al.*, No. 702871/14 (Queens County, N.Y.), a personal injury action alleging ignition switch defects in a 2006 Cadillac DTS. Copies of the motions filed in *Berger* and *Popwell* are attached hereto as Exhibits 6–7, respectively.

Sixth, the following filings were made and orders entered related to proceedings in the Bankruptcy Court since the parties' June 19, 2015 joint letter to the Court (see Doc. No. 1056):

- June 22, 2015: The Pre-Closing Accident Plaintiffs filed with the Bankruptcy Court a statement of issues/designation of record on appeal.
- June 23, 2015: Plaintiff in *Pillars v. General Motors LLC*, No. 1:15-cv-11360 (E.D. Mich.), filed an Objection Pleading and a No Dismissal Pleading in parallel with respect to the Bankruptcy Court's June 1, 2015 Judgment and April 15, 2015 Decision on Motion to Enforce Sale Order.
- June 24, 2015: The Ignition Switch Plaintiffs filed a No Strike Pleading and motion to withdraw the reference with regard to the Second Amended Consolidated Complaint, and certain Non-Ignition Switch Pre-Closing Accident Plaintiffs filed original and amended

KIRKLAND & ELLIS LLP

The Honorable Jesse M. Furman
July 2, 2015
Page 3

reservations of rights regarding the litigation of late claims. Also, Lead Counsel filed a No Stay Pleading on behalf of plaintiffs in *Hailes, et al. v. General Motors LLC, et al.*, No. 15PU-CV00412 (Pulaski County, Mo.), a dismissed individual economic loss action alleging ignition switch defects in a 2005 Chevrolet Cobalt and a 2007 Saturn Ion.

- June 29, 2015: The GUC Trust filed with the Bankruptcy Court a statement of issues/designation of record on appeal, while New GM filed both a statement of issues/designation of record on appeal and a motion to strike certain items designated for the record on appeal by appellants. Further, New GM filed a Response and Cross-Petition with the Second Circuit in response to the June 18, 2015 petition for direct appeal filed by plaintiffs in *Elliott* (MDL No. 1:14-cv-08382), and Designated Counsel for the Ignition Switch Plaintiffs and Ignition Switch Pre-Closing Accident Plaintiffs filed with the Second Circuit a motion to intervene in the appeal and a response to the *Elliott* plaintiffs' petition. Also, the Honorable Robert E. Gerber entered an order denying a motion filed by Doris Phillips (MDL No. 1:14-cv-08540) for Rule 60(b) relief from a settlement she previously entered into with General Motors Corporation (n/k/a Motors Liquidation Company).
- June 30, 2015: Designated Counsel filed a Notice of Errata in the Second Circuit with respect to their motion to intervene in the appeal and response to the *Elliott* plaintiffs' petition.

Copies of the foregoing documents are attached hereto as Exhibits 8-22, respectively.

Seventh, pursuant to Order No. 1 § X.8, the Defendants' July 21, 2014 Status Letter (Doc. No. 73) included an Exhibit A listing cases consolidated to date in MDL 2543, as well as an Exhibit B listing related cases pending in state and federal court, together with their current status. For the Court's convenience, updated versions of Exhibits A and B are attached hereto as Exhibit 23.

KIRKLAND & ELLIS LLP

The Honorable Jesse M. Furman
July 2, 2015
Page 4

Finally, the parties continue to work to ensure that the Court is provided with current and correct contact information for presiding judges in actions listed in the aforementioned Exhibit B. To that end, the Federal/State Liaison Counsel intends to shortly submit to the Court updates, if any, to the e-mail addresses of the presiding judges in Related Actions.

Respectfully submitted,

/s/ Richard C. Godfrey, P.C.

/s/ Andrew B. Bloomer, P.C.

Counsel for Defendant General Motors LLC

cc: The Honorable Robert E. Gerber
Lead Counsel for Plaintiffs
Federal/State Liaison Counsel
Plaintiff Liaison Counsel
Counsel of Record for Defendants